REMARKS/ARGUMENTS

The Office Action mailed January 28, 2004 has been reviewed and carefully considered. Before the present Amendment, Claims 1-14 were pending, with Claims 1 and 8 being in independent form. In the present amendment, Claims 1-7 have been cancelled without prejudice, Claim 8 has been amended to clarify the nature of the present invention, Claim 12 has been amended to correct for a minor error, and Claim 15 has been added. After the present Amendment has been entered, Claims 8-15 will be pending, with Claims 8 and 15 being in independent form. Reconsideration and withdrawal of the objections and rejections in the Office Action are requested on the basis of the foregoing amendments and the following remarks.

As a preliminary matter, two issues raised in the Telephone Interview Summary dated May 4, 2004 concerning the telephone interview between T. Holmberg representing applicant and Examiner T. Mauro on April 28, 2004 should be discussed. First, the applicant's representative did not intend to state that the "claimed invention, ..., is not the content converter itself, but rather the location of the content converter" as indicated in the Telephone Interview Summary. Regardless of whether the applicant's representative misspoke or was misunderstood, the more accurate statement is that one of the most relevant distinguishing features of the claimed invention is the location of the content converter in comparison to the prior art. Second, in response to the Examiner's direction to file a new power of attorney in order that the applicant's representative be listed as the attorney of record for the present application, applicant's representative directs the Examiner's attention to the attached Power of Attorney signed by the inventor.

In ¶3 of the January 28, 2004 Office Action, the Examiner objected to the misspelling of "Internet" (as "intent") in the originally filed specification. In response, the misspelling has been corrected in the present Amendment. Withdrawal of the objection is respectfully requested.

In ¶4 of the Office Action, the Examiner objected to the drawings because "they fail to specifically show how the documents are adjusted within the content converter as described in the specification" and, further, required that corrected drawings be filed. The method claims have

been cancelled without prejudice in the present Amendment, therefore there is no present need for a flowchart showing method steps. However, once certain issues have been resolved regarding the claimed invention, method claims may be restored to the present application, at which point drawings may be added.

The drawing objection was discussed in the April 28, 2004 Telephone Interview, where it was agreed that certain graphics would be presented in the instant Amendment "to further exemplify the claimed invention". Those graphics are shown in the following pages of the instant Amendment. If the Examiner believes that any or all of these graphics should be formally added as drawings to the present application, the Examiner is respectfully requested to inform applicant in the next Office Action.

In ¶5 of the Office Action, the Examiner objected to Claim 12 as having improper antecedent basis. In response, the antecedent basis has been corrected in the present Amendment. Withdrawal of the objection is respectfully requested.

In ¶¶7-8 of the Office Action, the Examiner rejected Claims 1-14 under §102(a) as anticipated by *Carlino et al.* (WO 00/39666) and, in ¶¶9-10, the Examiner rejected Claims 1-14 under §102(e) as anticipated by *Martin Jr. et al* (US 6,610,105) in the alternative. In response, independent Claim 8 has been amended slightly to clarify the nature of the invention claimed herein; it is believed that amended Claim 8 is patentable over *Carlino, Martin,* and their combination, as will be explained below.

Admittedly, there are many similarities between *Carlino, Martin,* and the preferred embodiments of the present invention, as they are all directed to converting HTML documents from the Internet into WML documents for mobile terminals, such as cellular telephones. Moreover, they all consider the individual characteristics of the particular mobile terminal (i.e., its capabilities for presentation) as well as the individual user's preferences regarding the presentation of material when converting the HTML content into WML material for the mobile terminal.

However, there is one simple and dramatic difference between the invention claimed in amended independent Claim 8 and the two cited prior art references: the location of the "Content Converter".
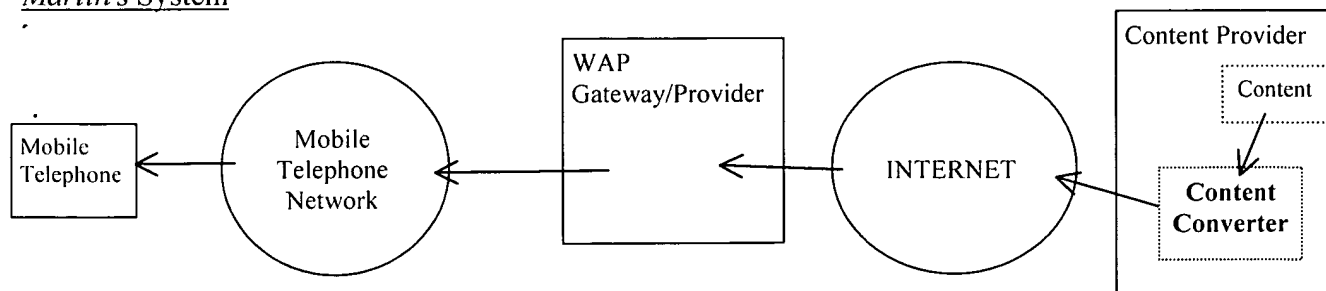
In *Carlino*, the Content Converter is connected directly to the WAP Gateway (see, e.g., Content Converter 16 in FIG. 1 of *Carlino*). Thus, as shown in the simplified graphic illustrating the *Carlino* system below, Content is transmitted from the Content Provider over the Internet to the WAP Gateway, which has an integrated Content Converter that converts the Content into a format suitable for the Mobile Telephone. After conversion in the WAP Gateway, the converted Content is transmitted over the Mobile Telephone Network to the Mobile Telephone. This is similar to the prior art flow shown in the bottom of FIG. 3 of our application.
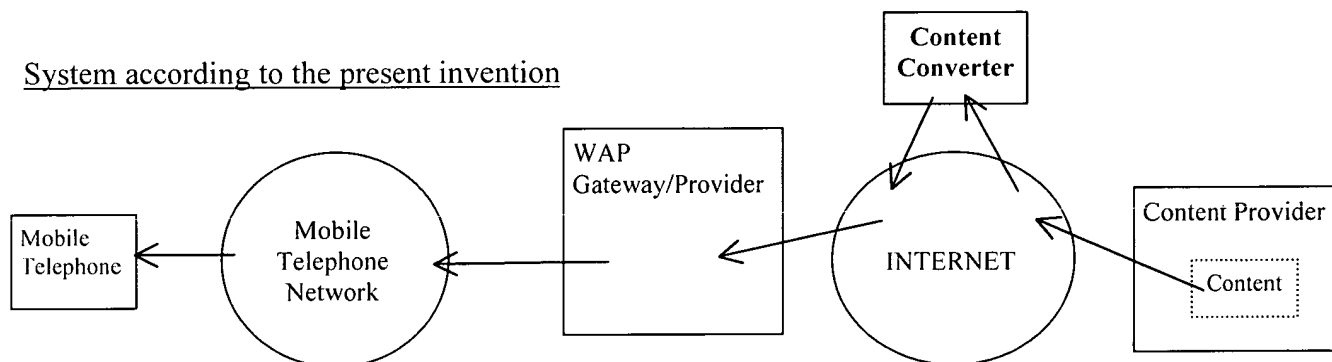
Carlino's System
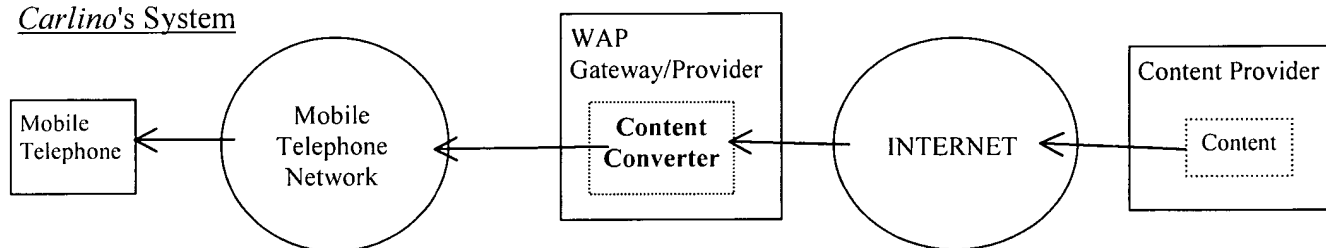
In *Martin*, the Content Converter is integrated into what we call the "Content Provider", i.e., the Web server which is providing the content (see, e.g., FIG. 2B of *Martin* and accompanying description). *Martin* requires that the Content Provider keep track of who is requesting the content and sending the appropriately formatted content in reply. Thus, as shown in the simplified graphic illustrating the *Martin* system below, Content is converted by the Content Provider before it is transmitted over the Internet to the WAP Gateway, which forwards the converted Content over the Mobile Telephone Network to the Mobile Telephone.

Martin's System

By contrast, the Content Converter of the present invention is completely separate from both the WAP Gateway and the Content Provider. As shown in the simplified graphic below (similar to FIG. 2 of the present application), the inventive Content Converter is connected directly to the Internet, but has *no* direct connection with, and is *not* integrated into, either the WAP Gateway or the Content Provider. Thus, Content is transmitted from the Content Provider over the Internet to the Content Converter, which converts the Content into the appropriate format for the destination Mobile Telephone. After conversion, the converted Content is transmitted from the Content Converter over the Internet to the WAP Gateway, which forwards the converted Content over the Mobile Telephone Network to the Mobile Telephone.

<u>System according to the present invention</u>

The separation and isolation of the Content Converter from the other components of the system clearly distinguishes the present invention from both *Carlino* and *Martin* and provides certain benefits which are not available in *Carlino*, *Martin*, and the prior art in general. Because of the Content Converter's separation from the WAP Gateways and the Content Providers, the WAP Gateways and Content Providers do not need integrated or directly connected Content Converters (as are required in *Carlino* and *Martin*), thereby (1) greatly simplifying the WAP Gateways and Content Providers, and (2) providing a great deal of flexibility in the implementation of the mobile terminals, WAP Gateways, and Content Providers. In a system according to the present invention, multiple WAP Gateways (perhaps in separate cellular networks) and multiple, completely unrelated Content Providers can use a single Centralized Content Converter for document conversion, thus avoiding the potential complexities of prior art systems, such as *Carlino* and *Martin*. As stated in

the present application, the "present invention permits vendors to introduce new forms of content with no need to distribute appropriate conversion programs to a plurality of WAP servers. The conversion can simply be incorporated into central content converter 400" (lines 9-11 on page 8 of the specification).

At least because amended independent Claim 8 recites a content converter "separate from the at least one gateway," and "separate from the at least one content server", which is neither taught nor suggested by *Carlino*, *Martin*, or their combination, Claim 8 is patentable over *Carlino*, *Martin*, and their combination. At least through their dependence on Claim 8, Claims 9-14 are also believed to be patentable over *Carlino*, *Martin*, and their combination. Withdrawal of the rejections of Claims 8-14 is respectfully requested.

Newly added independent Claim 15 contains no new matter and is in condition for allowance. Support for Claim 15 can be found at least in originally filed Claims 1 and 8, as well as in FIGS. 2 and 3 and their accompanying descriptions in the originally filed specification. At least because newly added independent Claim 15 recites a content converter which "is separate and distinct from said content server and from said gateway", which is neither taught nor suggested by the cited prior art, Claim 15 is patentable over the cited prior art. Allowance of Claim 15 is respectfully requested.

At least on the basis of the foregoing amendments and arguments, it is believed that all pending claims in the present application are in condition for allowance, which is respectfully requested.

Respectfully submitted,
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